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Organization:
Title:
Comments: September 5, 2024

Subject: Removal of Wild Horses Outside the Montgomery Pass Wild Horse Territory (MPWHT) #6495

Dear Mr. Swisher and other Concerned Parties,

I previously submitted written comments on June 18, 2024, regarding the Preliminary Environmental Assessment (PEA); Submission ID: MPWHT-1-500703797. I find it necessary to write again to express my deep concerns about the proposed actions detailed in the final Environmental Assessment (EA) for the Montgomery Pass Wild Horse Territory (MPWHT).

Upon reviewing the EA and considering the public comments from the PEA phase, it is clear that significant discrepancies and omissions persist, which urgently require your attention. The EA continues to describe the Montgomery Pass wild horses-commonly known as the Mono Lake horses-as merely invasive and detrimental, neglecting their ecological and historical importance. This skewed portrayal fails to acknowledge their roles in carbon sequestration, wildfire prevention, and biodiversity enhancement.

Furthermore, the EA does not adequately address crucial factors such as harassment by ranchers and disturbances from off-highway vehicle (OHV) users, which likely contribute to the herd's migration beyond their designated territory. Moreover, the document lacks innovative and humane management solutions, heavily relying on drastic measures such as helicopter roundups.

The management strategies proposed are out of step with the ecological realities and do not align with the latest scientific findings, including a 25-year study that demonstrates natural population control by mountain lions. The Appropriate Management Level (AML), set over three decades ago, is outdated and fails to reflect the current ecological and scientific insights.

Recommendations for Immediate Action:

1. Relocate Within Territory: The USFS should explore humane alternatives like bait trapping to relocate the horses within the MPWHT borders. It is crucial to address the ecological conditions that are causing their migration.

2. Reevaluate the AML: A thorough reassessment of the AML using updated scientific data is imperative to ensure it accurately represents the current ecological conditions.

3. Cease Helicopter Roundups: These operations are inhumane and cause significant distress to the horses. Alternative methods such as bait traps should be employed, allowing for incremental removals if necessary.

4. Assess Livestock Grazing Impacts: The extent of livestock grazing within and surrounding the MPWHT must be carefully assessed and considered in all management decisions.

5. Incorporate Current Science: Management strategies should integrate findings from recent studies, including those on natural predation and the environmental benefits provided by the horses.

The management of the Montgomery Pass wild horses must be guided by informed, humane, and scientifically

sound approaches, rather than outdated data or biased assessments. These horses are not only a symbol of the American West but also a vital part of our ecological system and national heritage.

Thank you for considering these points. I strongly urge you to reconsider the proposed management strategies and commit to a more humane, balanced, and scientifically grounded approach in addressing this issue.

Sincerely,
Carolyn Borkowski